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APR 10 2001

From: Commander, Thirteenth Coast Guard District (m)
To: Commandant (G-MOC)

Subj: CLARIFICATION OF SURVIVAL CRAFT REQUIREMENTS FOR SMALL PASSENGER VESSELS

1. On March 11, 2001, a majority of the small passenger vessels operating in the Thirteenth Coast Guard District will be required to comply with new survival craft requirements as outlined in 46 CFR Part 180. Confusion has arisen regarding applicable requirements where operators may choose to upgrade from a lifefloat to an IBA, although the latter would not normally be required for the vessels.
2. Vessels operating on a cold water Oceans route are required to have IBAs for 100% of the capacity of passengers authorized, or lifefloats for 100% of the capacity of passengers authorized if the vessels meet the applicable subdivision requirements. Confusion arises on routes where a vessel meeting subdivision requirements must have 100% lifefloats while a vessel not meeting subdivision requirements must have IBAs for 67% of the capacity of passengers onboard the vessel. Field units have forwarded inquiries from "T" boat operators regarding what capacity requirements apply to vessels that voluntarily choose to carry IBAs in lieu of their original lifefloat requirements. Is 100% capacity per the original lifefloats, or 67% per the IBAs more appropriate? The regulations do not specifically address this scenario.
3. Logic would dictate that a vessel that voluntarily upgrades to a survival craft offering a higher level of safety should not be penalized. A vessel that is allowed to carry lifefloats in lieu of IBAs is already deemed to have sounder construction or be operating on a route of lesser severity. Also, an IBA for 67% of passengers authorized can actually carry 100% of passengers onboard, thus there is no apparent reason for requiring a vessel to upgrade from lifefloats to anything more than 67% IBA carriage requirement. Therefore, a vessel upgrading from a lifefloat should be required to meet whatever capacity requirement applies to carriage of IBAs on that route.
4. This position is fully supported by the preamble to the Final Rule on Small Passenger Vessel Inspection and Certification that notes "One comment states that 67% inflatable buoyant apparatus does not provide enough capacity for all passengers carried. The Coast Guard disagrees. As stated in the preamble to the IFR, IBAs are tested to a 150% overload capacity. This means that a vessel with 67% IBA capacity can accommodate 100% of the persons on board."
5. Unless otherwise directed, the above will serve as D13's policy for survival craft requirements on small passenger vessels. If you have any questions regarding this issue, my point of contact is LCDR Wong at (206) 220-7224.


J. E. VEENTJER
By direction

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